

EXHIBIT B

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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ANIMAL SCIENCE PRODUCTS, INC.,
2864 FM 1275
Nacogdoches, TX 75961

RESCO PRODUCTS, INC.,
2 Penn Center West
Pittsburgh, PA 15276

Plaintiffs,

— v. —

CHINA MINMETALS CORPORATION,
5 Sanlihe Road, Haidian,
Beijing, China 100101

**CHINA NATIONAL MINERALS CO,
LTD.,**
Bldg 15 Block 4 Anhui Li, Chaoyang,
Beijing, China 100101

XIYANG GROUP,
Xiyang Mansion, Yingluo Town, Liaoning,
Haicheng, China 114200

**XIYANG (PACIFIC) IMPORT & EXPORT
LTD. COMPANY,**
Bin Guan, Xiyang Steel & Iron Headquarters
Haicheng, Liaoning, China 114200

Case No. 05-4376 (GEB)

FIRST AMENDED CLASS ACTION
COMPLAINT

JURY TRIAL DEMAND

XIYANG REFRACTORY MATERIALS LTD. COMPANY,
10F Sinochem Tower, Office A-2,
Fuxingmenwai Street, Beijing 114213

XIYANG FIREPROOF MATERIAL CO. LTD.,
Yinglou Town, Liaoning,
Haicheng, China 114213

SINOSTEEL CORPORATION,
17B Xichang'an Street, West District
Beijing, China 100031

SINOSTEEL TRADING COMPANY,
17B Xichang'an Street, West District
Beijing, China 100031

LIAONING JIAYI METALS & MINERALS CO., LTD.,
1 Gangwan Plaza, Zhongshan
18/F NO.15 Renmin Road
Dalian, China 116001

LIAONING FOREIGN TRADE GENERAL CORPORATION,
2 Hongyan Street, Xigang District
Dalian, China 116001

LIAONING JINDING MAGNESITE GROUP,
Nanlou Economic Development District,
Liaoning, Dashiqaio, China 11503

DALIAN GOLDEN SUN IMPORT & EXPORT CORP.,
11F Fortune Mansion, 18 Shiji Street, Liaoning,
Dalian, China 116001

HAICHENG HOUYING CORP. LTD.,
Wanke Dongyuan Building No. 2015
Liaoning, Anshan, China 114002

HAICHENG HUAYU GROUP IMPORT & EXPORT CO. LTD. (HUAZIYU),
Hua Zi Yu Village, Bali Town, Liaoning
Haicheng, China

**HAICHENG PAILOU MAGNESITE ORE
CO. LTD.,**

Pailou Town, Haicheng,
Anshan, China 114207

YINGKOU HUACHEN (GROUP) CO. LTD.,

Fenshui, Dashiqiao,
Liaoning, China 115100

Defendants.

Plaintiffs, by and through their undersigned attorneys, bring this action on their own behalf and on behalf of all others similarly situated for treble damages and injunctive relief under the antitrust laws of the United States against the above-named Defendants, demanding a trial by jury. Plaintiffs file this First Amended Complaint pursuant to this Court's Order of December 30, 2008.

I. NATURE OF THE ACTION

1. This case arises out of a conspiracy among all Defendants and their co-conspirators that has the purpose and effect of fixing prices of magnesite and magnesite products exported to and purchased in the United States. Defendants have also committed other unlawful practices designed to inflate the prices of magnesite and magnesite products sold to Plaintiffs and other purchasers in the United States and elsewhere. This action seeks no damages or relief with respect to non-import foreign commerce or products sold outside of U.S. commerce.

2. Defendants have directly sold and delivered magnesite and magnesite products to customers in the United States at prices inflated, fixed, and maintained by the conspirators pursuant to horizontal agreements to restrain trade. The allegations of this Complaint of a conspiracy are not inferred from evidence of parallel pricing; instead, Defendants have expressly agreed and conspired to fix prices and limit competition. Defendants also engaged in communications and meetings. This is confirmed by documentary evidence from a nongovernmental association of which Defendants are members. These acts constitute *per se* violations of Section 1 of the Sherman Act, 15 U.S.C. § 1.

3. The conspiracy has existed from at least April 2000 to date, and increased its effectiveness through new agreements to fix prices and limit supply entered in 2003. Defendants' illegal cartel has deliberately targeted and severely burdened consumers in the United States. The cartel has affected hundreds of millions of dollars of commerce in products that are used in American manufacturing facilities and households.